

REMEDIAL SITE ASSESSMENT DECISION EPA - REGION 5

SITE NAME: Commonwealth Edison EPA ID# LD 000806505

ALIAS SITE NAME(S): _____

CITY: _____ COUNTY: _____ STATE: IL

REPORT DATED: 11/2000 REPORT TYPE: Memo

REPORT PREPARER: EPA - SF/RCRA SITE TYPE: _____ GAO ☒ IG

DISCUSSION/RATIONALE: "Lead Confirmed" - site deferral to
RCRA is correct.

Special Initiative Flag entered.
See attached.

Report Reviewed/
Site Decision Made by: J. Guggin Date: 11/15/00

Region 5 Revision of EPA Form # 9100-3, 11/00 - Special - IG Audit

EPA Region 5 Records Ctr.



304448

**RESOURCE CONSERVATION AND RECOVERY ACT
HANDLERS ASSESSMENT**

FOR:

**COMMONWEALTH EDISON COMPANY
BRAIDWOOD NUCLEAR POWER STATION
BRAIDWOOD, ILLINOIS
ILD 000 806 505**

**PREPARED BY :
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF LAND
DIVISION OF REMEDIATION MANAGEMENT
FEDERAL SITES REMEDIATION SECTION
SITE ASSESSMENT UNIT**

SEPTEMBER 2000

SITE BACKGROUND

Introduction

On June 29th, 1999 the Illinois Environmental Protection Agency's (Illinois EPA) Site Assessment Program was tasked by the Region 5 offices of the United States Environmental Protection Agency (U.S.EPA) to undertake an initial assessment of a number of Resource Conservation and Recovery Act (RCRA) facilities within the State. These facilities are presently contained within the RCRA database, but are not subject to RCRA corrective action authorities and are currently referred to as RCRA "handlers". The RCRA Handlers Assessment is designed to identify facilities, which may pose a threat to human health or the environment, and to determine if placement of these facilities into the Comprehensive Environmental Response, Compensation, and Liability Inventory System (CERCLIS) is warranted.

Site Description and History

The Commonwealth Edison Company Braidwood Nuclear Power Station (Commonwealth Edison) site was placed on CERCLIS on January 17, 1994. In April 1994, Commonwealth Edison received a Preliminary Assessment/Visual Site Inspection (PA/VSI). The PA/VSI Report evaluated the Commonwealth Edison site for the potential to release hazardous substances from 10 solid waste management units (SWMU) and other potential areas of concern. Following the PA/VSI, Commonwealth Edison received a RCRA deferral status on CERCLIS.

The Commonwealth Edison facility is a full-steam electricity generating station that utilizes two nuclear fission reactors for the production of heat. Occupying

approximately 4,457 acres, the facility is located in a rural area surrounded by a mixture of residential, undeveloped, and agricultural properties within Will County, Illinois. The village of Godley borders the northwest portion of the Commonwealth Edison facility and the town of Braidwood is located approximately one-half miles north of the facility boundary.

Construction of the Commonwealth Edison facility began in 1975. Prior to 1975, the property was used for surface coal mining beginning in approximately 1947. The Braidwood facility began generating electricity in 1988 and is currently active.

On September 13, 2000, Illinois EPA's Site Assessment Unit personnel visited the Commonwealth Edison facility located in Braidwood. The facility is completely surrounded by a chain-linked fence with security personnel at each entrance. All SWMU's described in the PA/VSI Report are located within buildings or surrounded by a secured fence. Wastes stored within the buildings are kept within closed containers, and inside of secondary containers stored on concrete floors. Some SWMU's described in the 1994 PA/VSI Report are no longer in use.

The Commonwealth Edison facility generates a non-hazardous sewage and lime sludge. Once accumulated, the waste is transported to adjacent open fields for land application. This process is regulated by Illinois EPA permits. The Nuclear Regulatory Commission regulates wastes that could contain high or low levels of radiation.

In 1990 and 1991, two separate incidents occurred which released diesel fuel to on-site soils. Following the spills, both incidents were reported, contained, and remediated. On May 25, 2000 an estimated 4,420 gallons of oil was released from an outdoor separator into a perimeter ditch along the northwest portion of the facility. The

spill was reported to the National Response Center and Illinois Emergency Management Agency. An application from Commonwealth Edison to enter the Illinois EPA's Site Remediation Program was received on August 4, 2000. Commonwealth Edison, Illinois EPA, and the Illinois Department of Public Health are currently addressing contaminated soils within the ditch, potential ecological damages, and area groundwater impacts.

Pathway Analysis

Groundwater in the vicinity of the Commonwealth Edison facility has been characterized as flowing in all directions. Within the soils beneath the facility, a cement-bentonite slurry trench has been installed. The trench hydraulically isolates the shallow aquifer at the site from areas surrounding the facility. Groundwater from the shallow aquifer is not used as a drinking water supply in the vicinity of the facility.

The nearest surface water body is a 2,537 acre, clay lined, cooling pond which is located south of the electricity generating area. The pond provides cooling water for the electricity generating process. The cooling pond is designated as a fishery and is used for recreational purposes according to the Illinois Department of Natural Resources.

The Wastewater Treatment Plant discharges effluent water into the Kankakee River approximately 3 miles east of the facility. The discharge is regulated by a National Pollutant Discharge Elimination System (NPDES) permit.

Access to the facility is restricted. A double fence that is also monitored by surveillance cameras surrounds the main buildings, which contain the nuclear reactors and several SWMU's. Access to the buildings is controlled by security staff and locked

doors. Although residences are located **near the** facility boundaries, they are actually located from one-half to one and one-half **miles** from the main buildings.

Conclusions and Recommendations

Given the limited potential of contaminants from this site entering the environment through one of the established migration pathways, this reviewer recommends that this facility should continue to be regulated by the federal RCRA program and the Nuclear Regulatory Commission, and not be entered in the Comprehensive Environmental Response Compensation and Liability Act's Information System database or the subject to any **additional CERCLA** investigative activities. This assessment has shown that any **environmental** concerns at this facility are not of a magnitude that would warrant **CERCLA Removal** or Remedial attention. If in the event, that past or future oils spills have impacted **off-site** targets, the Oil Pollution Act (OPA) would address this release.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

September 18, 2000

Ms. Jeanne Griffin
Emergency Response Branch
Region V Offices
Office of Superfund
U.S. Environmental Protection Agency
77 West Jackson
Chicago, Illinois 60604

Dear Ms. Griffin:

Please find enclosed a copy of the Resource Conservation and Recovery Act Handlers Assessment Report and site recommendation for the following sites slated for completion in our Fiscal 2000 Site Assessment cooperative agreement.

SITE NAME	COUNTY	CERCLA RECOMMENDATION
Amoco Oil Co Main Office 006272629	Madison	No
Chemisphere Storage 180014839	Cook	No
Chicago Care Incorp 043905504	Cook	Yes
Gateway Petroleum 092358548	St. Clair	Yes
Carlisle Syntec Incorp 980503304	Bond	Yes
Gardner-Denver Copper 000814772	Adams	Yes
Barker Chemical Co 180014722	Cook	No
Flint Ink Corp 006537245	Cook	No
Betz Dearborn Incorp 009722281	Cook	No
Federal Mogul 070686282	Cook	No
Fab-rite Metal Products 001837517	DuPage	No
Atwood Vacuum Machine 005163035	Winnebago	No
Commonwealth Edison 000806505	Will	No

We are pleased to provide you with the attached report. Should you have any questions or comments concerning this submission please feel free to contact me, or the authors of the specific report.

Sincerely,

Thomas Crause

Manager, Site Assessment Programs
Division of Remediation Management
Illinois Environmental Protection Agency

GEORGE H. RYAN, GOVERNOR



Superfund Site Assessment Data Management

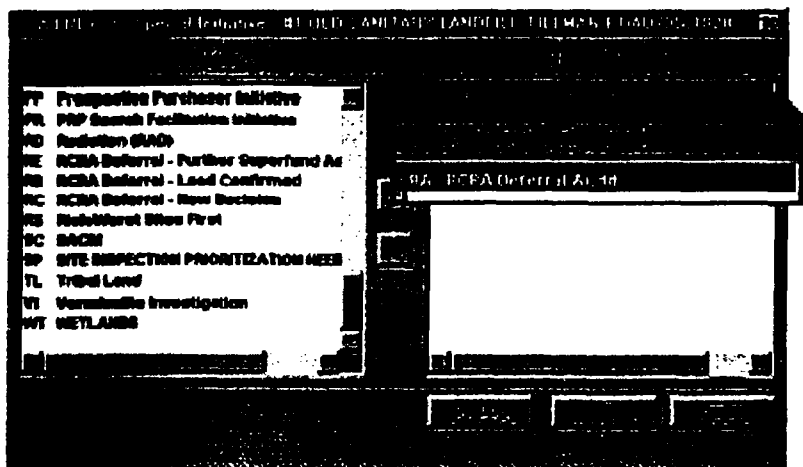
EPA - Office of Emergency and Remedial Response

Reporting RCRA Deferral Activities

July 2000

What are RCRA Deferral Sites?

A March 1999 report by EPA's Office of the Inspector General (OIG) identified 2,941 Superfund sites that have been deferred to the Resource Conservation and Recovery Act (RCRA) program. The OIG report determined that 842 sites are being appropriately addressed under RCRA, and 2,099 need further attention.



EPA has developed two measures to track and evaluate these 2,099 sites in WastelAN. First, EPA Headquarters will flag the sites using the existing "RCRA Deferral Audit" Special Initiative, and Regions will be able to enter one of the following three new Special Initiatives: RCRA Deferral—Lead Confirmed; RCRA Deferral—New Decision; or RCRA Deferral—Further Assessment. The second measure adds a new WastelAN action, "Site Reassessment", that will track reassessment activities at sites.

How Will Tracking RCRA Deferral Sites Benefit EPA?

Use of the one existing and three new Special Initiatives and the new WastelAN action, "Site Reassessment," will allow EPA to:

- Readily identify the OIG RCRA deferral sites and accurately report their current status;
- Effectively track reassessment activities, recording dates and fiscal year accomplishments; and
- Receive proper credit for reassessment work performed in the Regions.

Additionally, these new initiatives allow the Regions to track the status of RCRA deferral sites that were identified in the 2,099 sites needing further attention. The new "Site Reassessment" action does not replace current assessment actions; it serves as a supplement in instances when some assessment is needed to evaluate new information on a site, yet a full assessment action is not warranted under the Superfund program.

How Will Regional Staff Maintain RCRA Deferral Activities?

Regions will be responsible for entering the new WastelAN Special Initiatives. The new Regional Special Initiatives are:

- RCRA Deferral—Lead Confirmed: Indicates that the RCRA-Deferral decision was accurate; i.e., there is no change to the current RCRA deferral status.
- RCRA Deferral—New Decision: Indicates that EPA is correcting or changing the currently-listed decision from "Deferred to RCRA" to another indicator.
- RCRA Deferral—Further Superfund Assessment: Indicates that EPA needs to conduct further assessment to update the status. (This initiative should be used in conjunction with the new Site Reassessment action.)

Regions will also be responsible for recording Site Reassessment activities using the new WastelAN action.



rcradfml.pdf

Who Can I Contact for More Information?

For more information on this Special Initiative, call 1-888-646-6262 or visit the WastelAN website at www.epa.gov/wastelan. For more information on the RCRA Deferral Sites, call 1-888-646-6262 or visit the RCRA Deferral Sites website at www.epa.gov/rcradfml.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: November 20, 2000

SUBJECT: Lead Confirmation for Sites Identified in the FY'1999 OIG Audit of Sites Deferred
to RCRA

FROM: Joseph Dufficy
Brownfield/Early Action Section
Superfund Division

Gerald Phillips
Corrective Action Manager
Waste, Pesticides & Toxics Division

TO: SITE FILES

This memo is to memorialize the lead decisions for those sites that the Office of the Inspector General (OIG) identified in the March 1999 report, entitled "Superfund Sites Deferred to RCRA." The OIG audit recommended that Superfund reevaluate all deferred sites not in the RCRA corrective action workload to determine the best legal authority to address the sites, and any response actions necessary in order to improve communication between the programs. The OIG also recommended that the two programs should reach agreement on which program will take lead responsibility for each of the sites by the end of calendar year 2000.

The OIG lists for Region 5 included (493 sites) 'Sites Subject to Corrective Action', and (184 sites) 'RCRA Handlers' that may not be subject to corrective action. These two lists (attached) have been reviewed by both programs and are identified with one of the three Special Initiative flags. For those sites that have been scored under the RCRA NCAPS model, they are noted as RCRA Deferral - Lead Confirmed. For those sites to be addressed under Superfund, they are identified on the attached lists as RCRA Deferral - New Decision or RCRA Deferral - Further Assessment. All sites requiring reassessments by Superfund will have findings provided to RCRA for their information.

Attachments (2) *

cc: State Site Assessment Contacts
EAPMs

* FOR ATTACHMENTS PLEASE REFER TO THE FOLLOWING TWO SITE FILES:

AKZO COATINGS INC. 12D006390553

AG COMMUNICATION Sys. 12D005070545